

# UNITED STATES ENVIRONMENTAL PROTECTION AGENCY REGION 10

EC 21

1200 Sixth Avenue Seattle, Washington 98101

APR 04 1997

Reply To
Attn Of: ECO-088

Carrmine Lockwood, District Ranger Palouse Ranger District Route 2, Box 4 Potlatch, Idaho 83855

Re: White Pine Creek Environmental Impact Statement (EIS), Vegetation Management Analysis; Clearwater National Forest, Beneway and Latah Counties, Idaho

The Environmental Protection Agency has received the White Pine Creek draft EIS for review in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. We conducted a limited review of the draft EIS, focussing on water quality impacts.

Based upon this review, we have rated the draft EIS EC-2 (Environmental Concerns - Insufficient Information). We are concerned that implementation of best management practices and associated mitigation measures may not ensure protection of beneficial uses downstream of the project area. It is not clear that mitigation measures implemented on past projects have helped to offset the impacts from timber harvest activities. Additional information is needed on how proposed BMPs and mitigation measures will in fact offset the proposed timber harvest activities.

An explanation of the EPA rating system for draft EISs is enclosed for your reference. This rating and a summary of these comments will be published in the <u>Federal Register</u>. We appreciate this opportunity for early involvement in this project. If you have questions, please contact John Bregar in our Office of Ecosystems and Communities at (206) 553-1984.

Sincerely,

Cor Richard B. Parkin, Manager

Geographic Implementation Unit

measures may not ensure protection of beneficial uses drongs band of

## U.S. Environmental Protection Agency Rating System for Draft Environmental Impact Statements Definitions and Follow-Up Action\*

## Environmental Impact of the Action

## LO - - Lack of Objections

The Environmental Protection Agency (EPA) review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

#### EC - - Environmental Concerns

The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce these impacts.

### EO - - Environmental Objections

The EPA review has identified significant environmental impacts that should be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no-action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

# EU - - Environmentally Unsatisfactory

The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the Council on Environmental Quality (CEQ).

## Adequacy of the Impact Statement

## Category 1 - - Adequate

EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis of data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

# Category 2 - - Insufficient Information

The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonaby available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses or discussion should be included in the final EIS.

## Category 3 - - Inadequate

EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the National Environmental Policy Act and or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

\* From EPA Manual 1640 Policy and Procedures for the Review of Federal Actions Impacting the Environment. February, 1987.